(11)

No. 90-401

FILED
NOV 20 1990

In the

SUPREME COURT OF THE UNITED STATES

October Term, 1990

BETSEY WARREN LEBBOS,

Petitioner

vs.

SUPREME JUDICIAL COURT OF THE COMMONWEALTH OF MASSACHUSETTS

Respondent

REVISED
MOTION FOR LEAVE TO FILE AN AMICUS CURIAE BRIEF IN SUPPORT OF PETITIONER

JOHN B. GUNN, ESQ. (Pro Se)
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Amicus Curiae
for Petitioner

No. 90-401

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Now comes John B. Gunn, a duly licensed and practicing California attorney and counselor at law for 33 years and requests leave of court, pursuant to United States Supreme Court Rule 37, to file an Amicus Curiae brief at the Petition stage in support of this Honorable

Court's grant of the Petition for a Writ of Certiorari and for Petitioner, Attorney Betsey Warren Lebbos.

Amicus is interested as it appears the alleged State Bar Court is unconstitutional due to its creation in conflict with Article 6, sections 1, et. seq. of the California Constitution by asserting it has a) co-extensive and co-equal subject matter jurisdiction over licensing of lawyers to that of the State Supreme Court, and b) co-equal and co-extensive subject matter jurisdiction to try the merits of law suits pending in the constitutional courts of law.

This motion is filed now in order to comply with the deadline as the opposing party, Supreme

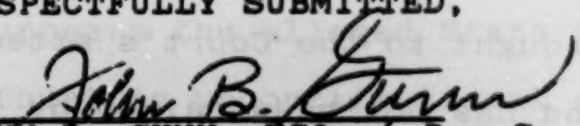
Judicial Court, and Bar Counsel have not returned the written consent required of United States Supreme Court Rule 37.2.

This information has not already been brought to the Court's attention and has not been raised by the parties, except indirectly by Petitioner.

Pursuant to United States Supreme Court rule 37, this Amicus brief should be dispositive of the issue of whether the principles of Comity or Full Faith and Credit may be applied to statutes creating an alleged State Bar Court of the California State Bar Association, a private organization. Thus, Amicus re- he be permitted to file the enclosed Amicus Curiae brief and he re-

quests the Petition be granted so that attorneys are not forced to try their cases in two alleged courts at the same time and lose their right to work if they refuse to do so.

RESPECTFULLY SUBMITTED,



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